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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

INTERNATIONAL SPICE HOLDINGS, LLP,  Plaintiff,  vs.  AMERICAN SUGAR REFINING, INC.,  Defendant.	Civil Action No. 3:17-CV-00102-PGS-TJB   <b>RULE 502(d) STIPULATION AND ORDER</b>
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It appearing that discovery in the above-captioned action is likely to involve the disclosure of confidential information, it is ORDERED as follows:

1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information at any time in this action, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Stipulation and Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

So stipulated by counsel for the parties this 3rd day of August 2018.

<p><b>LAWRENCE C. HERSH</b></p> <p>By <u>/s/ Lawrence C. Hersh</u> Lawrence C. Hersh, Esq.</p> <p>Lawrence C. Hersh, Esq. 17 Sylvan Street - Suite 102B Rutherford, NJ 07070 Tel: (201) 507-6300 Fax: (201) 507-6311  <u>lh@herschlegal.com</u></p> <p>and</p> <p>Cameron S. Reuber, Esq. (admitted pro hac vice) Lori Cooper, Esq. (to apply for pro hac vice) LEASON ELLIS LLP One Barker Avenue – Fifth Floor White Plains, NY 10601 Tel: (914) 288-0022 Fax: (914) 288-0023 <u>reuber@leasonellis.com</u> <u>cooper@leasonellis.com</u></p> <p><i>Attorneys for Plaintiff/Counterclaim Defendant International Spice Holdings, Inc.</i></p>	<p><b>BRESSLER, AMERY &amp; ROSS, P.C.</b></p> <p>By <u>/s/ Charles W. Stotter</u> Robert Novack, Esq. Charles W. Stotter, Esq. J. Emma Mintz, Esq.</p> <p>325 Columbia Turnpike Florham Park, NJ 07932 Telephone: (973) 514-1200 Fax: (973) 514-1660</p> <p><u>rnovack@bressler.com</u> <u>cstotter@bressler.com</u> <u>cgallo@bressler.com</u></p> <p>and</p> <p>David B. Cupar, Esq. (admitted pro hac vice) Matthew J. Cavanagh, Esq. (admitted pro hac vice) McDonald Hopkins, LLC 600 Superior Avenue, East Cleveland, Ohio 44114 Tel: (216) 348-5400 Fax: (216) 348-5474 <u>dcupar@mcdonaldhopkins.com</u> <u>mcavanagh@mcdonaldhopkins.com</u></p> <p><i>Attorneys for Defendant/Counterclaim Plaintiff American Sugar Refining, Inc.</i></p>
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**IT IS SO ORDERED.**

Dated: August 6, 2018

  
HON. TONIANNE BONGIOVANNI, U.S.M.J.